

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS' CONSOLIDATED
RESPONSE IN OPPOSITION TO PLAINTIFFS'
MOTIONS FOR LEAVE TO FILE EXCESS PAGES**

Defendants Secretary of State Brad Raffensperger, State Election Board, and the State Election Board Members (collectively, the “State Defendants”) submit this Response in Opposition to Plaintiffs’ Motions for leave to file excess pages. [Docs. 835 and 846].

Coalition Plaintiffs have requested 10 additional pages (for a brief not to exceed 25 pages) for their Reply in Support of their Motion for Preliminary Injunction regarding “BMDs, scanners and tabulators, and audits.” [Doc. 835]. Curling Plaintiffs have requested an additional 20 pages (for a brief not to exceed 35 pages) for their Reply in Support of their Preliminary Injunction Motions.

As stated in State Defendants' response in opposition to Coalition Plaintiffs' prior request for additional pages, [Doc. 804], State Defendants submit that there is sufficient briefing in the voluminous record before the Court now and any additional pages are unnecessary. State Defendants understand, however, that the Court may find some additional pages may, in fact, be necessary for Plaintiffs' Replies. Accordingly, State Defendants will consent to Reply Briefs totaling 20 pages regarding Coalition's BMD Motion and Curling Plaintiffs' only Reply, so long as State Defendants are afforded the same number of pages for their forthcoming Surreply.

As is the custom in this District, State Defendants will not use a Response to a Motion on page limits to argue the merits of the case, nor to attack the Curling Plaintiffs or respond to the gratuitous attacks contained in Curling Plaintiffs' Motion. Such is not conducive to the efficient resolution of this case and is disrespectful to this Court and opposing counsel.

For the foregoing reasons, State Defendants respectfully request this Court deny Coalition Plaintiffs' Motion for Excess Pages or, in the alternative, permit the Defendants additional time to respond.

Respectfully submitted this 1st day of September, 2020.

/s/ Carey A. Miller
Vincent R. Russo
Georgia Bar No. 242628

vrusso@robbinsfirm.com
Josh Belinfante
Georgia Bar No. 047399
jbelinfante@robbinsfirm.com
Carey A. Miller
Georgia Bar No. 976240
cmiller@robbinsfirm.com
Alexander Denton
Georgia Bar No. 660632
adenton@robbinsfirm.com
Brian E. Lake
Georgia Bar No. 575966
blake@robbinsfirm.com
Robbins Ross Alloy Belinfante Littlefield LLC
500 14th Street, N.W.
Atlanta, Georgia 30318
Telephone: (678) 701-9381
Facsimile: (404) 856-3250

Bryan P. Tyson
Georgia Bar No. 515411
btyson@taylorenghish.com
Bryan F. Jacoutot
Georgia Bar No. 668272
bjacoutot@taylorenghish.com
Diane F. LaRoss
Georgia Bar No. 430830
dlaross@taylorenghish.com
Loree Anne Paradise
Georgia Bar No. 382202
lparadise@taylorenghish.com
TAYLOR ENGLISH DUMA LLP
1600 Parkwood Circle, Suite 200
Atlanta, GA 30339
Telephone: 678-336-7249

Counsel for State Defendants

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing **STATE DEFENDANTS' CONSOLIDATED RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTIONS FOR LEAVE TO FILE EXCESS PAGES** has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(C).

/s/ Carey A. Miller
Carey A. Miller